

### **REMARKS/ARGUMENTS**

Applicant appreciates the Examiner's thorough search and examination of the present patent application.

Claim 16 is objected to for an obvious typographical error. Accordingly, claim 16 has been amended and the typographical error has been corrected.

Responsive to the objection to the drawings, at such time as an indication of allowable subject matter is received, formal drawings that are more legible and that contain legends with delimiters will be provided.

Claims 11-21 stand rejected under 35 U.S.C. §101 on the grounds that the claimed invention is directed to non-statutory subject matter. More particularly, the Examiner identifies a "mandatory" limitation that a "claimed computer-readable medium [be] encoded with a computer program [to define] structural and functional interrelationships between the computer program and the medium which permit the computer program's functionality to be realized[.]" Applicant respectfully notes that the United States Patent and Trademark Office has issued patents directed to "systems" that comprise computer program modules, and, thus respectfully disagrees with the Examiner's position. Nevertheless, claims 11 and 21 have been amended to include the feature of an "information processor" and "memory," respectively, to affirmatively claim the interrelationship between the computer program and the medium. Claims 12-20 depend directly or indirectly from claim 11 and, therefore, also include this claimed limitation. Reconsideration is respectfully requested.

Claims 1-8, 11-18 and 21 stand rejected under 35 U.S.C. §102(a) as being anticipated by the admitted prior art of Figures 3 and 4, and pages 1-4 of the background section in applicant's written specification. Applicant respectfully traverses this rejection.

Claim 1 has been amended to define using a "first software application to develop a source document" that includes instructions for an electronic message interface to enable a second software application to communicate with a third software application by adhering to rules defined in an application program interface. Applicant's amended claim 1 further defines using the same first software application to evaluate the source document to identify keywords in the source document that represent directives for the message interface. Further, applicant's amended claim 1 defines using the same first software application to generate high-level program

source code as a function of the identified keywords. The program source code is compiled into object code and functions as the electronic message interface comprising the instructions which comply with the application program interface.

The background section of applicant's written specification and corresponding figures describe problems associated with several parties that use various tools to develop a message interface that complies with a target application program interface ("API"). For example, rules regarding a target API are received by one party who develops a "mapping document" that identifies the rules for a computer programmer. The computer programmer uses the mapping document to write a software program in a high-level computer programming language. The software program typically is time-consuming to write, debug, and test. Sometimes, the software program runs, but does not correctly follow the rules of the target API.

Applicant's invention enables a user of a single software application to develop a "source" document, and the same software application to generate high-level program code from the source document. This eliminates the problems in the prior art described in the background section of applicant's written specification, such as the time and personnel costs associated with various parties and tools for developing frequently changing message interfaces. Applicant's admitted prior art does not teach or suggest a single software application that is operable to develop a source document and to generate program source code by evaluating keywords in the source document.

Therefore, applicant respectfully submits that claim 1, as amended, is not anticipated by the applicant's admitted prior art and defines patentable subject matter.

Independent claims 11 and 21, as amended, include similar limitations and are, therefore, patentable for the same reasons.

Claims 2-8 and 12-18 depend directly or indirectly from claims 1 or 11, respectively, and are, therefore, patentable for the same reasons as well because of the combination of features in those claims with the features set forth in the claim(s) from which they depend.

Claims 9, 10, 19 and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over applicant's admitted prior art in view of U.S. Patent No. 6,446,081 to Preston. Applicant respectfully traverses this rejection.

Preston regards a natural human language artificial intelligence system that includes a visual representation of input text and derived relationships between parsed elements of the input text. More particularly and unlike applicant's claim 9, 10, 19 and 20, Preston discloses a graphical user interface to enable a user to manipulate graphical representations of relationships between text in order to redefine and/or adjust the relationships (see column 2, lines 23-26). Any errors and ambiguities resulting from the derived relationships and/or parsed text can, therefore, be corrected by the user by manipulating graphical screen controls.

Respectfully, Preston does not teach or suggest elements of applicant's amended claims 1 and 11 regarding a software application for providing an electronic message interface that includes rules complying with a target API. Further, Preston does not teach or suggest using the software application to identify keywords in the instructions to develop high-level programming language source code that is compiled into object code to function as the message interface. Therefore, applicant respectfully submits that Preston does not supply elements of applicant's amended claims 1 and 11 that are missing from the prior art teachings described in the background section of applicant's written specification. Claims 9, 10, 19 and 20 depend directly or indirectly from claims 1 or 11, respectively, and, therefore, are not rendered obvious over the combination of applicant's admitted prior art and Preston.

Accordingly, it is submitted that claims 1-21 of the present application clearly define over the prior art. The Examiner is respectfully requested to reconsider the application, allow the claims as amended and pass this case to issue.

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450, on January 18, 2005:

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Respectfully submitted,

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